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CITY OF HENDERSON

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

KELLY WOODBURN, THOMAS  
WOODBURN, and JOSHUA  
RODRIGUEZ individually and on behalf  
of all others similarly situated,

Plaintiffs,

vs.

CITY OF HENDERSON; DOES I through  
V, inclusive; and ROE CORPORATIONS  
I through V, inclusive,

Defendants.

Case No. 2:19-cv-01488-JAD-VCF

**STIPULATION AND ORDER TO EXTEND  
THE DEADLINE FOR PARTIES TO FILE  
STIPULATED DISCOVERY PLAN AND  
SCHEDULING ORDER**

**[FIRST REQUEST]**

Plaintiffs KELLY WOODBURN, THOMAS WOODBURN, and JOSHUA RODRIGUEZ ("Plaintiffs"), and Defendant CITY OF HENDERSON ("Defendant"), by and through their respective counsel of record, do hereby stipulate and request an order extending the deadline for the parties to file a Stipulated Discovery Plan and Scheduling Order pursuant to [ECF No. 74] by fifteen (15) days from the current deadline of December 20, 2021, up to and including **January 4, 2022**. This is the first request for an extension of time to file a Stipulated Discovery Plan and Scheduling Order.

1 The requested extension is necessary because the case has been stayed and parties need  
 2 additional time to confer regarding a revised Discovery Plan and Scheduling Order after the Court's  
 3 recent rulings on various motions. *See* Order Granting Plaintiffs' Motion for Collective Action,  
 4 Denying Defendant's Motion to Compel Arbitration, and Denying Defendant's Motion to Dismiss  
 5 [ECF No. 75]. Additionally, the parties are in the process of conferring related to a proposed stipulated  
 6 protective order Defendant believes is necessary in the case related to discovery going forward.  
 7 Defendant's counsel also has planned time out of the office in coming weeks for the holidays.  
 8 Accordingly, the additional time requested will allow the parties time to confer on the protective order  
 9 and to agree upon a revised Discovery Plan and Scheduling Order for the case going forward.

10 The instant request is made in good faith and not for the purpose of delay.

11 Dated: December 20, 2021

Dated: December 20, 2021

12 CLAGGETT & SYKES LAW FIRM

LITTLER MENDELSON, P.C.

14 By: /s/ Joseph N. Mott

15 JOSEPH N. MOTT, ESQ.

16 *Attorneys for Plaintiffs*

17 KELLY WOODBURN, THOMAS

18 WOODBURN, and JOSHUA

RODRIGUEZ

By: /s/ Ethan D. Thomas

MONTGOMERY Y. PAEK, ESQ.

ETHAN D. THOMAS, ESQ.

EMIL S. KIM, ESQ.

*Attorneys for Defendant*

CITY OF HENDERSON

20 **IT IS SO ORDERED.**

21 Dated: December 20, 2021.

23 

24 UNITED STATES MAGISTRATE JUDGE

26 4869-8026-9063.1 / 080828-1020